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VIA ELECTRONIC FILING

The Honorable Jocelyn D. Boyd
Chief Clerk/Administrator

Public Service Commission of South Carolina

101 Executive Center Drive
Columbia, South Carolina 29211

February 19, 2020

Re: Petition of Georgia Power Company for Declaratory Order Finding that a Certificate of Environmental Compatibility and Public Convenience and Necessity is not Required or, in the Alternative, Application for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of Georgia Power's South Carolina portion of the Graniteville – South Augusta 230kV Tie Line and Associated Facilities.

Dear Ms. Boyd:

Attached for filing with the Public Service Commission of South Carolina ("Commission") on behalf of Georgia Power Company ("Georgia Power") is a Petition for Declaratory Order finding that a Certificate of Environmental Compatibility and Public Convenience and Necessity is not Required or, in the Alternative, Application for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of Georgia Power's South Carolina portion of the Graniteville – South Augusta 230kV Tie Line and Associated Facilities ("Petition/Application"). The Petition for Declaratory Order is filed pursuant to the Commission's Rules of Practice and Procedure and specifically Rule 103-825 (A)(2). *See* S.C. Code Ann. Regs. 103-825. The alternative Application for a siting certificate is filed pursuant to the provisions of the Utility Facility Siting and Environmental Protection Act, S.C. Code Ann. §§ 58-33-10 – 430, and the Commission's Rules for Electric Systems and specifically Rule 103-304. *See* S.C. Code Ann. Regs. 103-304.

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(continued...)

We respectfully request that the Commission consider the relief requested in this filing as follows:

1. First, consider and decide the Petition for Declaratory Order as promptly as practicable. If oral argument is desired, counsel for Georgia Power is prepared to appear before the Commission on short notice to argue in favor of granting the requested declaratory order that a siting certificate is not required and to address any questions that the Commission may have concerning the petition.
2. Second, should the Commission deny the relief requested in the Petition for Declaratory Order and determine that a siting certificate is required, then Georgia Power respectfully requests that the Commission grant the certificate requested in Georgia Power's application without requiring a formal oral hearing, but rather consider and grant the requested siting certificate based on the Petition/Application and exhibits filed herewith, the supporting evidence available by taking judicial notice of the Commission's official files in Docket No. 2017-221-E (Application of South Carolina Electric & Gas Company for a Certificate of Environmental Compatibility and Public Convenience and Necessity), and the findings and conclusions contained in Commission Order No. 2017-689 granting the siting certificate requested in Docket No. 2017-221-E by SCE&G for, among other approvals, its 18.1 mile-portion of the Graniteville – South Augusta 230 kV tie line and associated facilities.
3. Third, should the Commission deny Georgia Power's request for a declaratory order that no certificate is required under the factual circumstances at issue in this matter and also determine that a formal oral hearing is desired, then Georgia Power hereby respectfully requests that the Commission schedule such hearing as soon as practicable but not later than mid-April 2020 and issue an order granting Georgia Power the requested siting certificate not later than early May 2020.

By copy of this letter, we are also serving the South Carolina Office of Regulatory Staff and others as required by statute and attach a proof of service to that effect. In compliance with S.C. Code Ann. § 58-33-120(2), this letter shall also serve as notice that the Petition/Application was filed with the Commission on February 19, 2020.

If you have any questions regarding this filing, please advise.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.

s/Mitchell Willoughby

Mitchell Willoughby

(continued...)

MW/lla
attachments

cc: Nanette S. Edwards, Esquire
Jeffrey M. Nelson, Esquire
Ms. Dawn Hipp
(all via hand delivery w/enclosures)

Ms. Christy Hall
Mr. Clay Killian
Mr. Duane Parrish
Mr. Rick Toomey
Mr. Steven D. Smith
Mr. Robert H. Boyles, Jr.
The Honorable Gary Bunker
Mr. W. Eric Emerson
Mr. Joel T. Duke
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